SENT BY:

7-11-93 ;11:52AM ;

KINKO'S INDY 1-3012492953

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Consultation with other counsel resulted in these proposed adjustments to procedural dates as a realistic way to afford Trinity sufficient time to review SALAD's affidavits before the prehearing conference. However, SALAD notes that Trinity prefers to produce documents August 16 if SALAD's proposed schedule adjustments are adopted. However, Glendale needs the August 14-15 weekend to review the documents. These two exigencies cannot be harmonized. Trinity's document production will not increase because of the affidavits SALAD expects to exchange before the prehearing conference, however, the time from rulings to production will be cut from three to one day. Trinity's documents will have to have been compiled and assembled before rulings on motions to compel; however, unexpected rulings on those motions could require Trinity to scramble somewhat to make and deliver copies of documents the next day. SALAD recognizes that this might impose an additional burden on Trinity, but the forward movement of the exchange dates will ease another burden on Trinity. However, a backward movement of the production date would also impose a burden on Glendale which is not mitigated by the easing of any other burdens on Glendale. Therefore, since SALAD cannot make everyone happy in this matter, it has chosen to err on the side of maintenance of the production date.

Counsel for the other parties have each graciously indicated that they will not oppose this motion.

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Respectfully submitted,

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## CERTIFICATE OF SERVICE

I, David Honig, this 11th day of July, 1993, hereby certify that T have caused to be delivered by U.S. First Class Mail, postage prepaid, a copy of the foregoing "CONSENT MOTION TO ADJUST CERTAIN PROCEDURAL DATES" addressed to the following:

> Hon. Joseph Chachkin Administrative Law Judge Federal Communications Commission 2000 L Street N.W. #226 Washington, D.C. 20554 (by hand)

> James Shook, Esq. Gary Schonman, Esq. Hearing Branch Federal Communications Commission 2025 M St. N.W. #7212 Washington, D.C. 20554 (by hand)

Colby May, Esq. May & Dunne 1000 Thomas Jefferson St. N.W. #520 Washington, D.C. 20007

Howard Topel, Esq. Mullin Rhyne Emmons & Topel 1000 Conn. Ave. N.W. Washington, D.C. 20036

Lewis Cohen, Esa. Cohen & Berfield 1129 20th St. N.W. #507 Washington, D.C. 20036